

UNITED STATES DISTRICT COURT

for the

Middle District of Tenn ▼

Nashville Division

RECEIVED
in Clerk's Office

SEP 14 2021

U.S. District Court
Middle District of TN

William G. Creasy

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)

-v-

"See attached"

Defendant(s)

(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names. Do not include addresses here.)

Case No.

03-21 0714

(to be filled in by the Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Defendants

Dee David Gray and the Sumner County Justice Center

Lawrence Ray Whitely Sumner County Att General

Lytle A. Jame Sumner County ADA

Macon County Detective Gregory (Present at Preliminary Hearing for Case # 960-249)

Bobby Ward (Present at Preliminary Hearing for Case # 960-249)

Lori Bice Sumner County Criminal Court Reporter

Everyone on video During Preliminary Hearing Held in

Sumner County General Sessions Court for Case # 960-249.

(Public defenders for William & Celeb Creasy and State District Att present)

David Vance Public Defender

Blake Kelley Att. At Law

Judge Hunter Sumner Co. General Sessions Judge

Tennessee Supreme Court and the Tennessee

Board of Judicial Conduct. Assigned Complaints B21-8561 + B21-8562

Andrew G. Brigham Vice Chair

Marshall L. Davidson III Disciplinary Counsel

Shane Hutton Ass. Disciplinary Counsel

Beverly P. Sharpe Board of Professional Responsibility

Bill Lee Governor of Tennessee

Tennessee Bureau of Investigation

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

William G. Creasy

All other names by which
you have been known:

Gabe Creasy

ID Number

386256

Current Institution

TTCC

Address

140 Macon WayHartsville
CityTN
State37074
Zip Code**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Dee David GayJob or Title (*if known*)Sumner Co. Criminal Court Judge

Shield Number

Employer

State of Tenn.

Address

117 W. Smith St.Gallatin
CityTN
State37074
Zip Code

☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name

Sumner Co Justice Center andJob or Title (*if known*)Dee David Gay

Shield Number

Employer

Address

117 W. Smith St.Gallatin
CityTN
State37066
Zip Code

☐ Individual capacity ☒ Official capacity

Defendant No. 3

Name

Lawrence Ray Whitely

Job or Title (if known)

District Atty General

Shield Number

Employer

State of Tenn

Address

109 West Main St.

Gallatin

City

TN

State

37186

Zip Code



Individual capacity



Official capacity

Defendant No. 4

Name

Tenn Board of Judicial Conduct

Job or Title (if known)

Shield Number

Employer

state of Tenn

Address

P.O. Box 92276

Nashville

City

TN

State

37209

Zip Code



Individual capacity



Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

~~Federal officials (a § 1983 claim)~~



State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Amendment 4, Amendment 5, Amendment 6, Amendment 8 U.S. Constitution
Section 16, Section 17, Section 9, Section 10, Tenn Constitution
Amendment 14 U.S. Constitution

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

All Parties Denied me Due process of the law, Discovery such as Dash-cam Video Was withheld for Case # 946-2014. I was found over at preliminary hearing for Case # 960-2014 by lies told by Macon Co. Detective Gregory. If anything he said was true he would have had a warrant. No discovery was ever shown for Case # 960-2014 + 989-2014. They killed my father & brother so no one else asked. There still being prosecuted in Macon Co & Sumner Co put them up to it.

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (explain)

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

Sumner County Justice Center 2-7-2019 around 5:00pm I was denied numerous constitutional rights by Det Bay and forced into taking Case # 946-2018 on 4-4-2014. David Lane PD. After a VOP I was given a preliminary hearing on Case 960-2014 where I was not allowed to defend myself or confront witnesses. My wife & brother were only arrested to use against me in my conviction on 2-13-2020 where when I asked for a discovery was told to "take the deal or Fuck you" by PD Duke Kelly.

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

Statement of Claim #1

On 2-7-2019 after telling my public defender David Vance I wanted him removed from my case and I wanted to talk to the Judge, long Story short its right at 5:00 pm when I'm brought into the courtroom only people in the room are Me, David Vance, ADA Bryant Grant, Bailiff, Some women probly Lee C. Ore and Judge Dee Daniel Bay. I inform Judge Bay that David Vance refuses to do what I've asked him to do I want him removed from my case, I want to represent myself, Speak to the DA and file for a fast & speedy trial. Like I said in my complaint sent in to James Hiner Supreme Court Clerk Me and Dee Bay argue until Bryant Grant complains its getting late and she has to pickup her daughters. I continue to voice my concerns until Judge Bay tells me that "This is his courtroom and I'll get a trial when he says I can have a trial. And orders the bailiff to get me out of the courtroom. He says he's a 5 min Request, but I'm not heard from again until 4-4-2019. The Bailiff tells me he's never seen someone talk to the Judge like that or seen him that mad. When I'm brought to court on 4-4-2019 I had no prior Notice and when David Vance met me at the window and I told him I thought I'd freed him, he said no, what do you want to do? I told him my dad was sick and I need home. He came back at charging time with 16 years on Community Control and said after the way I'd acted just then he recommended I take it. I'd be at least 2 years before I went to trial, and helped about evidence I never seen. Bryant Grant was paid for Verdict, Prosecution. That's how David Bay Secretary to Judge Bay.

Statement of Claims #2

After being on Community Corrections Probation for 4 months with Mrs. Jinneth Woodard with no problems what-so-ever My Probation is Violated when I am charged with Crimes that should never of been allowed in the first place. Me and my brother have a preliminary hearing concerning the theft of a trailer.

I was appointed a public defender that was useless, In no way whatsoever was he any kind of defense. Finally when I re had enough I speak up for myself where I am told to shut up. If I am not mistaken by the D.A. Judge Hunter seems to know whats going on and allows it to happen. Everything Mason County Detective Gregory Saps is a lie. If he had the Info said to be had he would have come with a warrant, but because he didn't he set on the road until my PO told there after I made him leave my property, then he arrested my brother after the hearing, where my brother almost had detective Gregory up against the wall with no one intervening until I got control of the situation and told him to get out. We were framed, railroaded, denied our Constitutional rights and It was not on black tapes. Me and Nickie are charged with the same charges as Sumner & Mason County - Feb-13-2020 I am

took to Court without Prior Notice Blake Kelley tells
me If I plead out everything gets run concurrent and
my brother Caleb & My wife Nicole get Nolleprossed.
They should never have been arrested I had repeatedly
said they were not there because their my family
and when I told Blake Kelley I needed 30
days to talk to my family I I wanted a discovery
he came back After supposedly speaking with ADA
Lytle & James with either take the deal or Fuck
You. And that my wife & Brother would be prosecuted
to the fullest extent of the law. Or Sign on the line
Say Ye Sir No Sir Thankyou please and They go home
Today. My 16 yr old son the same and it comes to
Macon County to Me, Caleb, & Nicole are still facing charges
in Macon County and on my way out of the courtroom they said
Dustin Hunkemiller "The Victim" If He wants money for the truck
I supposedly stole and totaled. He'd have to take it up in
Civil Court. Tenn Court Says Victims are entitled restoration
and its the states job to make sure they get it.
They dont even care about the Victims. I want Courtroom
Camera Surveillance And Audio For Cases 986-2018, 960-2019, &
989-2018. Only with thanks to my family & with no
discovery and lies by people under Court. Was I ever made
to take this time.

C. What date and approximate time did the events giving rise to your claim(s) occur?

Feb 2-2019 at 4:50-5:00pm in Sumner County Criminal Court
 4-4-2019 4:30-5:00pm in Sumner County Criminal Court
 Preliminary Hearing for Case 960-2019 around 3:00 in Sumner County General Sessions Court
 2-13-2020 midday Sumner County Criminal Court

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

on 2-7-2019 Dee Gay Denied me my Constitution rights and removed me from Court. Transcript purchased for Case 946-2019 on 2-7-2019 Is a lie and Not Correct.
 I wasn't allowed to defend myself at preliminary hearing Case# 960-2019 and after being found over was sentenced 2-13-2020 without a discovery for 960, + 989-2019 with threats to my wife & brother.
 Tennessee Board of Judicial Conduct refuse to produce Courtroom Surveillance if Audio to prove what I say to be fact. a years worth of Rose Deek Nations asking for a hearing by Dee Gay they refuse to give up the Chair of the Board.

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I want this Court to get Courtroom Camera Security Footage and Audio for Case# 946-2019 and play it with Transcript that I had to purchase to show its Not Correct by a long shot. ADA Bryna Grant Got paid for Vindictive Prosecution. Im not guilty of my convictions. So I want to Sue for 16 million dollars and have my Sentence Voided. ~~I want to Sue for 16 million dollars and have my Sentence Voided.~~
 I want Courtroom Security Camera Footage & Audio for preliminary hearing for Case# 960-2019 so everyone can see I wasn't defended or allowed to defend myself or confront witnesses.
 I want all discovery for Case# 960-2019 + 989-2019 Cause I never got one and was threatened with the prosecution of my wife & brother when I asked for one. Void Those Sentence's as well.
 I want this Court to read my Post-Conviction denied by Dee Gay and all denied Post-Motions Denied me by Dee Gay. And read all Complaints turned into the Board of Tenn Judicial Conduct. and 16 million Dollars for 16 years you can have back. ~~(Cont. see)~~

I've asked Numerous times for audio and Camera Footage Lori Bice put us off for two weeks when we paid for transcript Dee Gay Refused to let me have. She "Lori" stalled for time but produced Transcript after two weeks Its Not Correct, all lies, Bryna Grant Complains its getting late and she has to pick-up her daughter before Im removed from Court and I said so in Complaint titled "Complaint of Judicial Misconduct" June-6-2021 sent in to James Hurrever Supreme Court Clerk before Transcript was purchased. Only time Bryna Grant mentions having to pick-up her daughter in Transcript is after Im removed from the Courtroom. Wait until everyone see's it. its after 5 no one but David Vance my P.D., Me, William Geary, ADA Bryna Grant, Judge Gay and the bailiff, I ask to invoke my Constitutional Rights and Judge Gay tells me I'll get what he says I'll get when he says I can have it. Treats me with total disrespect and when I continue to voice my concerns has me removed from the Courtroom for a 5 min. Recess. No one ever tells me anything until 4-4-2019 when next Im brought to court. I want the Video for both dates I want everyone to see the two sides of Dee Gay, Bryna Grant was fired for Venictive Prosecution and I got Dee Gay setting the stage. If I cant get 32 million Dollars out of this for the way Ive been treated I'll sell A+E Court Cam the Video's of 2-7-2019 + The Video of General sessions preliminary hearing.

After Video & Audio for 2-7-2019 is shown no one will ever ask anymore Questions. They'll Know why I took what I took.

Got Video & Audio for Case # ~~946-2018~~ 946-2018 All of it, every Corollate from General Sessions to Sentencing. And The Same for Case # 960-2019 + 989-2019. I'd like to Invite Newsch 4

For the Proceeding if no party objects and I'd like for all of us to watch and listen to it together. So that if I missed someone in my list of defendants we can add them to the list. I don't want to leave anyone out.

I'm 45 mins from Nashville, I'm asking to Expedite these proceedings. I'll be sure to Notify News ch 4 as soon as this is filed. Thank you for your time

Respectfully
William B. Pease

A/su:

My Family has contacted Governor Bill Lee by email and I've left recorded messages with his office. I've been ignored and told that the Governor don't handle Individual or Law enforcement Complaints. I'd like to have Cops of everything sent into Bill Lee's Email and a list of names for those responsible for answering them.

And who, if anybody, is in charge of the Task Force Supposedly put in place to check Tornado & their Sentences. Complaints have been made to the TBI & FBI. No one seems to want to look into this matter.

Respectfully
William B. Pease

basis for claims

I've done everything I know to do and after
Curt Coker informed us that a letter to the Court
Was all that was needed to have a hearing because
ADA Grant Was Filed for Verdict Prosecution. I've
been denied access to Court for over the last year by
Dee Gay & when reported to the Tenn Board of
Judicial Conduct my complaints are denied by the
board Where the Chair is none other than Dee Gay.
Evidently my life and my Innocence mean nothing
to them. I want 16 million from Summer County and
everyone involved and 16 million from Tennessee Supreme Court
and Those responsible for denying my complaints.

I want Joe Biden Informed and I want all my
rights put back in place & My record cleared. The Same for
My Wife & Brother Nicole & Caleb.

I want 16 million for us and I want 16 million to do
my part for Society. I'll fix the ceilings in Middle TN's
schools and give those in Waverly that can't help themselves
any kind of assistance I can with what ever 8 million
dollars can do. 16 million for Me, Caleb & Nicole. 8
million for Middle TN Public school ceilings & 8 million
for those in need in Waverly. any way I want to give
it to them I hope Joe Biden will allow me to be
a Tennessee state Rocky Corbett.

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☐ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☐ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☐ No

☐ Do not know

If yes, which claim(s)?

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☐ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

2. What did you claim in your grievance?

3. What was the result, if any?

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☒ Yes

☐ No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) William G. Greasy

Defendant(s) Sumner County Criminal Court

2. Court (if federal court, name the district; if state court, name the county and State)

U.S. District Court Middle Tennessee

3. Docket or index number

3:21-cv-00536

4. Name of Judge assigned to your case

Eli Richardson

5. Approximate date of filing lawsuit

7-16-2021

6. Is the case still pending?

☒ Yes

☐ No

If no, give the approximate date of disposition.

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Pending

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes

☒ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition _____

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: *Aug - 31 - 2021*

Signature of Plaintiff *William D. Creasy*

Printed Name of Plaintiff *William D. Creasy*

Prison Identification # *386256*

Prison Address *140 Malcon Way Hartsville TN 37074*

City

State

Zip Code

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

City

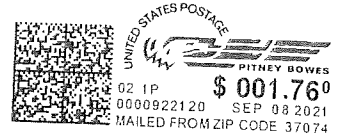
State

Zip Code

Telephone Number _____

E-mail Address _____

William G. Creasy #386256
TTCC
140 Macon Way
Hartsville TN 37074



LEGAL MAIL
LEGAL MAIL

Office of the Clerk
U.S. District Court
801 Broadway
Nashville, TN 37203

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U.S. District Court
Middle District of TN

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